

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ANDREW WALKER, JR.,

Plaintiff,

v.

MONICA RICH KOSANN ET AL.,

Defendants.

CASE NO.: 1:23-CV-04409-UA

**DEFENDANT PROVENANCE GEMS,
LLC’S NOTICE OF MOTION AND
MOTION TO DISMISS, PURSUANT
TO FED. R. CIV. P. 12(B)(2)**

PLEASE TAKE NOTICE of the following: (1) Plaintiff filed his Second Amended Complaint within the above-captioned matter on March 26, 2024; and (2) Defendant, Provenance Gems, LLC (“Provenance”), along with its accompanying Memorandum of Law, will move that this Court, pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, before the Honorable Judge Arun Subramanian, at the Thurgood Marshall United States Courthouse, 500 Pearl Street, Courtroom 15A, New York, New York 10007-1312, at a date and time determined by the Court, enter an order dismissing Plaintiff’s claims herein against Provenance *with prejudice*, and for such other and further relief that this Court deems just and proper.

Dated: April 10, 2024

Respectfully submitted,

/s/ Paul A. Hankin

The Downs Law Group, P.A.

3250 Mary Street, Suite 307

Coconut Grove, FL 33133

Telephone: (305) 444-8226

Facsimile: (305) 444-6773

Jeremy D. Friedman, Esq.

Florida Bar No. 134643

jfriedman@downslawgroup.com

Paul A. Hankin, Esq., LL.M.

Florida Bar No. 125402

phankin@downslawgroup.com

Attorneys for Provenance Gems, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of April 2024, the foregoing document has been e-filed with the court via CM/ECF with a copy served automatically on all counsel of record.

/s/ Paul A. Hankin

Paul A. Hankin, Esq., LL.M.